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Attorneys for Plaintiff Jeremy Harkins

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA

JEREMY HARKINS

Plaintiff,

v.

SUTTER COUNTY; SUTTER COUNTY'S  
SHERIFF DEPARTMENT;  
CALIFORNIA FORENSICS MEDICAL  
GROUP; TAYLOR FITHIAN, M.D.;  
DORIS BROWN, FNP; SHERILL  
McGUIRE, RN; LISA ROGERS, RN;  
SHERIFF BRANDON BARNES;  
CAPTAIN DAN BUTTLER; SERGEANT  
HERNANDEZ; SERGEANT GARCIA;  
SERGEANT EATON; OFFICER E.  
BROOKS; OFFICER OLSON; OFFICER  
SANTOS; OFFICER WEATHERUP;  
WELLPATH MANAGEMENT, INC.;  
THOMAS PANGBURN, M.D. AND  
DOES 1-50,

Defendants.

Case No.: 2:20-CV-00347-KJM-EFB

**STIPULATION RE DISCOVERY CUT-  
OFF DATES & FUTURE PROCEEDINGS**

IT IS HEREBY STIPULATED by and between the Parties, through their respective  
counsel of record, that the following current discovery cut-off dates and future proceedings of

- (1) **Fact Discovery:** May 29, 2021;
- (2) **Expert Disclosures:** June 29, 2021;
- (3) **Expert Discovery:** August 29, 2021;
- (4) **Law and Motion:** September 29, 2021;

(5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by October 30, 2021.

be continued two months, with the new dates being:

(1) **Fact Discovery:** September 29, 2021;

(2) **Expert Disclosures:** October 29, 2021;

(3) **Expert Discovery:** January 29, 2022;

(4) **Law and Motion:** February 28, 2022;

(5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by March 28, 2022.

Good cause exists for this extension as discovery in this case involves numerous depositions, and discovery has been delayed due to the ongoing pandemic. Plaintiffs have named four additional defendants in its amended complaint. Plaintiffs are also waiting for a newly added defendant to answer the complaint.

All parties have also agreed to private mediation with Hon Maria-Elena James, and mediation will be completed in the last week of June 2021.

This is the second request for a discovery cut-off extension.

IT IS SO STIPULATED.

DATED: May 3, 2021

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/Brian G. Lance

Michael D. Green

Brian G. Lance

Attorneys for Plaintiff

DATED: May 3, 2021

LAW OFFICES OF JEROME M. VARANINI

By: /s/Jerome M. Varanini  
Jerome M. Varanini  
Attorneys for Defendants, California  
Forensic Medical Group, Inc.; Wellpath  
Management, Inc.; Doris Brown, Lisa  
Rogers, and Sherril McGuire

DATED: May 3, 2021

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/Gregory B. Thomas  
Gregory B. Thomas  
Michael A. Slater  
Attorneys for Defendants Sutter County,  
Sheriff Brandon Barnes, Captain Dan  
Buttler, Sergeant Gloria Hernandez, Sergeant  
Jose Garcia-Cortes, Former Sergeant Lestor  
Eaton, Officer Ethan Brooks, Sergeant  
Kaitlyn Olson, Officer Laurie Helzer, and  
Officer Michael Weatherup

The Court grants the parties' second request for an extension as follows:

- (1) **Fact Discovery:** September 29, 2021;
- (2) **Expert Disclosures:** October 29, 2021;
- (3) **Expert Discovery:** January 29, 2022;
- (4) **Law and Motion:** March 4, 2022;
- (5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by March 28, 2022.

IT IS SO ORDERED.

DATED: May 3, 2021.

  
CHIEF UNITED STATES DISTRICT JUDGE